

Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Sirs:

I write to you today as a member of the public safety community in support of a petition filed by the Association of Public Safety Communications Officials, Inc. **“RM-10077, Modification of Section 90.20 (c) of the Commissions Rules to permit use of Any Certified Public Safety Frequency Coordinator for Channels Below 470 MHz”**.

I can think of no recent commission action with a more positive effect on the existing public safety community than the effect this modification would bring. The ability for existing public safety radio systems to grow and expand without being associated with additional, burdensome costs is crucial to the public well being and the service they expect from the first responders in their communities.

Often, public safety agencies that utilize existing radio stations acknowledge the need to expand their services and attempt to acquire additional frequencies to work in concert with their current spectrum allocation. As the administrator of a statewide law enforcement communications system serving the citizens of the State of Missouri, I can tell from experience that rarely can Police/Local Government public safety pool channels be obtained by local law enforcement agencies needing to expand their operation. Quite often, the only available channels are from outside the law enforcement agencies/local governments associated service pool.

Under current FCC rules, these “out of service” channels require additional frequency coordination from another FCC certified coordinator, which include additional coordination costs associated with utilizing these channels. Additional frequency coordinators require unanticipated additional coordination fees that often prevent applicants from following through on their radio station improvement. Often, the additional costs **(the need of which are usually discovered after the local municipalities bid process is complete and a price for the work has been determined, requiring either the radio vendor or the local municipality to renegotiate the price for the system modification)** prevent the agency from completing the license modification and system improvement, and they often revert back to using their existing radio station, feeling the FCC licensing process has not allowed them to improve their service to the public.

The public should have the opportunity to select a frequency coordinator that can best assist them in the improvement of their radio system and be able to choose from the **public safety pool of frequencies** without the burden of the additional costs that are currently associated within this process. **I recommend the commission modify rule 90.20 (c) so that any of the four public safety coordinators can coordinate any of the public safety pool channels below 470 MHz.** The additional fees that multiple coordinators require prevent public safety agencies from being able to grow and serve their communities.

I would also add that any restructuring of the public safety radio pool below 470 MHz should show the commission leading the public safety transition to narrowband technology, which will lead to additional channel availability. The time has come for public safety agencies to recognize that wide band (20K) public safety voice channel allocations, being used where narrow band (11K) voice allocations are better suited, inhibits both them **and** their fellow agencies when it comes to growth and expansion of their existing systems. Since the commission required narrowband capability for type acceptance in 1997, the public safety community has had five (5) years to adapt and prepare to narrowband implementation below 470 MHz. The commission needs to remind the public that this eventual transition is in their best interest, not the commissions, and will allow the public safety radio community to maximize its limited resources.

Again, I urge you to issue and Notice of Proposed Rulemaking on RM-10077 in the spirit of improving public safety communications for all first responders.

Respectfully,

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